

EXHIBIT A

From: [remy](#)
To: [Kaufman, Rachel \(LAW\)](#)
Cc: [DiSenso, Anthony \(Law\)](#); [NYC Law Protest Team](#); [AG-NYPD Litigation](#); [Gray Legal Team-External](#); [Hernandez Team](#); [Payne Litigation Team](#); [Sierra Team](#); [Sow-Legal](#); [Wood](#); [rolonlegalteam.](#); [Thomas Kissane](#); [Robert Smith](#); [Stephen Mc Quade](#); [anthony.coles@dlapiper.com](#); [Andrew Quinn](#); [Anthony DiFiore](#); [Angela Li](#)
Subject: Re: [EXTERNAL] In re 2020 Policing - Meet and Confer re: Withheld Documents
Date: Monday, July 25, 2022 10:43:21 AM

Hi Rachel,

Thank you for this. Given the sizes and capabilities, along with what we've previously discussed, our view is that each subset (e.g., OTM affirmatively tagged; OTM null set; NYPD affirmatively tagged; NYPD null set) are meaningfully different enough to warrant separate samples. Thus, please let us know if Defendants are willing to provide Plaintiffs with 95/5 samples sets of documents (e.g., you send us whatever documents your computer randomly selects) for all four categories.

Also, to the extent that anything is privileged, obviously some description is necessary here (since nothing in either the automated or the manual methodology would have involved a privilege review at the relevant stage).

Yours,

Remy.

J. Remy Green

Partner

Cohen&Green P.L.L.C.	[#FemmeLaw](#)
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[honorific / pronouns: Mx. / they, their, them](#)	
1639 Centre St., Ste. 216	Ridgewood (Queens), NY 11385



On Fri, Jul 15, 2022 at 12:47 PM Kaufman, Rachel (LAW) <RKaufman@law.nyc.gov> wrote:

Hi Remy,

We added the requested information in **green**:

1. OTM email: # unproduced docs in null set (not reviewed in NexLP or Relativity) – **26,816 docs**
2. NYPD email: # unproduced docs in null set (not reviewed in NexLP or Relativity) – **36,278 docs**
3. OTM email: # unproduced docs affirmatively tagged as not responsive in either NexLP or Relativity – **24,722 docs**
4. NYPD email: # unproduced docs affirmatively tagged as not responsive in either NexLP or Relativity – **26,177 docs**
5. Whether a 95/5 sample can be pulled from a combined null set (OTM and NYPD email) even though they are in different Relativity databases – **Yes this is possible.**

Rachel Kaufman

(212) 356-4096

rkaufman@law.nyc.gov

From: Kaufman, Rachel (LAW)

Sent: Tuesday, July 12, 2022 6:01 PM

To: remy green <remy@femmelaw.com>; DiSenso, Anthony (Law) <adisenso@law.nyc.gov>

Cc: NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam . <rolonlegalteam@aboushi.com>; Thomas Kissane <TKissane@schlamstone.com>; Robert Smith <robert.smith@rsmithlaw.com>; Stephen Mc Quade <SMcQuade@pittalaw.com>; anthony.coles@dlapiper.com; Andrew Quinn <aquinn@quinnlawny.com>; Anthony DiFiore <adifiore@quinnlawny.com>; Angela Li <ali@schlamstone.com>

Subject: RE: [EXTERNAL] In re 2020 Policing - Meet and Confer re: Withheld Documents

Remy,

We are writing to let you know that we will provide you with the requested information by Friday (7/15). For the sake of clarity, this is the information that we will provide:

1. OTM email: # unproduced docs in null set (not reviewed in NexLP or Relativity)
2. NYPD email: # unproduced docs in null set (not reviewed in NexLP or Relativity)
3. OTM email: # unproduced docs affirmatively tagged as not responsive in either NexLP or Relativity
4. NYPD email: # unproduced docs affirmatively tagged as not responsive in either NexLP or Relativity
5. Whether a 95/5 sample can be pulled from a combined null set (OTM and NYPD email) even though they are in different Relativity databases

Rachel Kaufman

(212) 356-4096

rkaufman@law.nyc.gov

From: remy green <remy@femmelaw.com>

Sent: Tuesday, July 5, 2022 2:47 PM

To: DiSenso, Anthony (Law) <adisenso@law.nyc.gov>

Cc: NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam . <rolonlegalteam@aboushi.com>; Thomas Kissane <TKissane@schlamstone.com>; Robert Smith <robert.smith@rssmithlaw.com>; Stephen Mc Quade <SMcQuade@pittalaw.com>; anthony.coles@dlapiper.com; Andrew Quinn <aquinn@quinnlawny.com>; Anthony DiFiore <adifiore@quinnlawny.com>; Angela Li <ali@schlamstone.com>

Subject: Re: [EXTERNAL] In re 2020 Policing - Meet and Confer re: Withheld Documents

Hi all,

Please use this link at 2:00 pm tomorrow:

<https://baruch.zoom.us/j/4827291379>

J. Remy Green

Partner

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On Tue, Jul 5, 2022 at 2:41 PM DiSenso, Anthony (Law) <adisenso@law.nyc.gov> wrote:

If you could send a link, that would be great.

From: remy green <remy@femmelaw.com>

Sent: Tuesday, July 5, 2022 2:41 PM

To: DiSenso, Anthony (Law) <adisenso@law.nyc.gov>

Cc: NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam . <rolonlegalteam@aboushi.com>; Thomas Kissane <TKissane@schlamstone.com>; Robert Smith <robert.smith@rsmithlaw.com>; Stephen Mc Quade <SMcQuade@pittalaw.com>; anthony.coles@dlapiper.com; Andrew Quinn <aquinn@quinnlawny.com>; Anthony DiFiore <adifiore@quinnlawny.com>; Angela Li <ali@schlamstone.com>

Subject: Re: [EXTERNAL] In re 2020 Policing - Meet and Confer re: Withheld Documents

Yes, confirmed. Should we send a link, or would you like to?

Sent from a mobile device, please excuse any thumbing or stumbling.

J. Remy Green

Partner

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| honorific / pronouns: Mx. / they, their, them |

On Jul 5, 2022, at 2:39 PM, DiSenso, Anthony (Law)
<adisenso@law.nyc.gov> wrote:

Hi Remy,

We can be available from 2 to 3 on Wednesday. Would that work?

Regards,

Anthony

From: DiSenso, Anthony (Law)
Sent: Friday, July 1, 2022 5:53 PM
To: remy green <remy@femmelaw.com>
Cc: NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@kllflaw.com>; rolonlegalteam . <rolonlegalteam@aboushi.com>; Thomas Kissane <TKissane@schlamstone.com>; Robert Smith <robert.smith@rsmithlaw.com>; Stephen Mc Quade <SMcQuade@pittalaw.com>; anthony.coles@dlapiper.com; Andrew Quinn <aquinn@quinnlawny.com>; Anthony DiFiore <adifiore@quinnlawny.com>; Angela Li <ali@schlamstone.com>
Subject: RE: [EXTERNAL] In re 2020 Policing - Meet and Confer re: Withheld Documents

We have some folks out of the office today, but I will check with them on Tuesday and get back to you.

From: remy green <remy@femmelaw.com>
Sent: Friday, July 1, 2022 5:43 PM
To: DiSenso, Anthony (Law) <adisenso@law.nyc.gov>
Cc: NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>; AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@kllflaw.com>; rolonlegalteam . <rolonlegalteam@aboushi.com>; Thomas Kissane <TKissane@schlamstone.com>; Robert Smith <robert.smith@rsmithlaw.com>; Stephen Mc Quade <SMcQuade@pittalaw.com>; anthony.coles@dlapiper.com; Andrew Quinn

<aquinn@quinnlawny.com>; Anthony DiFiore <adifiore@quinnlawny.com>;
Angela Li <ali@schlamstone.com>

Subject: Re: [EXTERNAL] In re 2020 Policing - Meet and Confer re:
Withheld Documents

Hi Anthony,

I'm actually on trial Thursday. Does anything Wednesday work?

Sent from a mobile device, please excuse any thumbing or stumbling.

J. Remy Green

Partner

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| [honorific / pronouns: Mx. / they, their, them](#) |

On Jul 1, 2022, at 5:36 PM, DiSenso, Anthony (Law)
<adisenso@law.nyc.gov> wrote:

Hi Remy,

We are available on Thursday from 1 to 2. Does that time work
for Plaintiffs?

Regards,

Anthony

From: remy green <remy@femmelaw.com>

Sent: Thursday, June 30, 2022 4:56 PM

To: DiSenso, Anthony (Law) <adisenso@law.nyc.gov>

Cc: NYC Law Protest Team

<NYCLawProtestTeam@law.nyc.gov>; AG-NYPDLitigation

<AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External

<GrayLegalTeam@dwt.com>; Hernandez Team

<hernandez@femmelaw.com>; Payne Litigation Team

<PayneLitigationTeam@nyclu.org>; Sierra Team

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<adifiore@quinnlawny.com>; Angela Li
<ali@schlamstone.com>

Subject: Re: [EXTERNAL] In re 2020 Policing - Meet and
Confer re: Withheld Documents

Hi Anthony,

It's exactly what we discussed in court today: what Defendants are willing to be (to use the Court's word) "forthcoming" about to assure us that (1) the null set and (2) the the set of documents affirmatively marked non-responsive do not contain relevant or responsive documents (like all of the examples identified in our letter turned out to be).

I think, in addition to a statistically valid sample of those populations, if Defendants provide on a priority basis the two documents identified in our letter that Defendants refused to produce, that too would be helpful.

Yours,

Remy.

Sent from a mobile device, please excuse any thumbing or stumbling.

J. Remy Green

Partner

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On Jun 30, 2022, at 3:08 PM, DiSenso, Anthony
(Law) <adisenso@law.nyc.gov> wrote:

Hi Remy,

We'll discuss internally and get back to you promptly with a time. So that we are prepared to address the issues you wish to discuss, it would be helpful if you could headline what those issues are and what plaintiffs are seeking at least 48 hours in advance.

Regards,

Anthony

From: remy green <remy@femmelaw.com>
Sent: Thursday, June 30, 2022 12:59 PM
To: DiSenso, Anthony (Law) <adisenso@law.nyc.gov>; NYC Law Protest Team <NYCLawProtestTeam@law.nyc.gov>
Cc: AG-NYPDLitigation <AG.NYPDLitigation@ag.ny.gov>; Gray Legal Team-External <GrayLegalTeam@dwt.com>; Hernandez Team <hernandez@femmelaw.com>; Payne Litigation Team <PayneLitigationTeam@nyclu.org>; Sierra Team <SierraTeam@moskovitzlaw.com>; Sow-Legal <Sow-Legal@blhny.com>; Wood <wood@klflaw.com>; rolonlegalteam . <rolonlegalteam@aboushi.com>; Thomas Kissane <TKissane@schlamstone.com>; Robert Smith <robert.smith@rsmithlaw.com>; Stephen McQuade <SMcQuade@pittalaw.com>; anthony.coles@dlapiper.com; Andrew Quinn <aquinn@quinnlawny.com>; Anthony DiFiore <adifiore@quinnlawny.com>; Angela Li <ali@schlamstone.com>
Subject: [EXTERNAL] In re 2020 Policing - Meet and Confer re: Withheld Documents

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Hi Anthony,

Please let us know when you are

available for a meet and confer in the next seven days or so. I don't think we'll need more than an hour, but I would appreciate if we get a time with some flexibility if we need to run long.

Yours,

Remy.

J. Remy Green

Partner

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